

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

MICHAEL A. CARDOZO  
Corporation Counsel

Chevon Andre Brooks  
212-788-0874  
212-788-8877 (fax)

May 23, 2008

By Hand:

Honorable George B. Daniels  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 630  
New York, New York 10007

**SO ORDERED**

*George B. Daniels*  
**HON. GEORGE B. DANIELS**

MAY 28 2008

Re: Williams v. Sindos, et al.  
Index No.: 08 CV 00378 (GBD)(JCF)

Dear Judge Daniels:

This office represents the City defendant, "Superintendent, Otis Bantum Correctional Facility", in the above-referenced action in which pro se plaintiff alleges: malpractice against the Legal Aid Society and Steven H. Sindos, false imprisonment against the State defendant, "Superintendent Ulster Correctional Facility", and that he was improperly transferred by the City defendant from a City correctional facility to a State correctional facility.

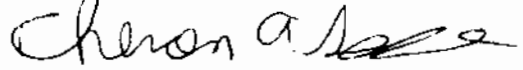
I write to request an extension, until June 27, 2008, to respond to plaintiff's complaint. This is the defendant's first such request. Defendant has made several attempts to contact plaintiff to obtain his consent for this request, but has been unable to do so. However, plaintiff will suffer no harm from this extension as the City defendant is only requesting an additional thirty days to respond to plaintiff's complaint in this action, and this time does not conflict with any other scheduled activity in this matter.

The reason for this request is that additional time is needed for this office to investigate the factual allegations in the complaint, to identify the City individual described in the complaint and to determine whether the Corporation Counsel may represent that individual under section 50-k of the New York General Municipal Law. One of the incidents referred to in the complaint occurred at a Department of Correction's facility. There are several potential witnesses that must be interviewed, including but not limited to those named in plaintiff's complaint. Additional time also will enable this office to research possible defenses, including whether the defendant was properly served, and to prepare an appropriate response.

Accordingly, City defendant respectfully requests that the Court grant him an additional 30 days (until Friday, June 27, 2008) to respond to the complaint in this action.

Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chevon A. Brooks", with a stylized flourish at the end.

Chevon Andre Brooks (CB 1616)  
Assistant Corporation Counsel

CC Ulysses Williams  
Plaintiff Pro Se  
2559 Sedwick Avenue  
Bronx, New York 10468  
(by express mail)